

1 Browne Greene, SBN 38441  
2 GREENE BROILLET & WHEELER, LLP  
3 222 N. Pacific Coast Highway, Suite 2100  
4 P.O. Box 955  
5 El Segundo, California 90245  
6 Telephone: (310) 576-1200  
7 Facsimile: (310) 576-1220  
8 Email: [bgreene@gbw.law](mailto:bgreene@gbw.law)

9 Daniel K. Balaban, SBN 243652  
10 BALABAN & SPIELBERGER, LLP  
11 11999 San Vicente Blvd., Suite 345  
12 Los Angeles, California 90049  
13 Telephone: (424) 832-7677  
14 Facsimile: (424) 832-7702  
15 Email: [daniel@dbaslaw.com](mailto:daniel@dbaslaw.com)

16 Joseph G. Dicks, SBN 127362  
17 Linda G. Workman, SBN 128621  
18 DICKS & WORKMAN ATTORNEYS AT LAW, APC  
19 7825 Fay Avenue, Suite 120  
20 La Jolla, California 92037  
21 Telephone: (619) 685-6800  
22 Facsimile: (619) 557-2735  
23 Email: [jdicks@dicks-workmanlaw.com](mailto:jdicks@dicks-workmanlaw.com); [lworkman@dicks-workmanlaw.com](mailto:lworkman@dicks-workmanlaw.com)

24 Holly N. Boyer (SBN 221788)  
25 Shea S. Murphy (SBN 255554)  
26 ESNER, CHANG & BOYER  
27 234 East Colorado Boulevard, Suite 750  
28 Pasadena, California 91101  
Telephone: (626) 535-9860  
Facsimile: (626) 535-9859  
Email: [hboyer@ecbappeal.com](mailto:hboyer@ecbappeal.com); [smurphy@ecbappeal.com](mailto:smurphy@ecbappeal.com)

Attorneys for MICKAIL MYLES, Plaintiff

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

1 MICKAIL MYLES, an individual,  
2 Plaintiff,

3 v.

4 COUNTY OF SAN DIEGO, by and  
5 through the SAN DIEGO COUNTY  
6 SHERIFF'S DEPARTMENT, a public  
entity; and DEPUTY J. BANKS,  
an individual,

7 Defendants.

Case No. 15-cv-1985-JAH (BLM)

**[PROPOSED] PLAINTIFF'S  
PRELIMINARY SEPARATE  
STATEMENT**

Trial: July 25, 2022  
Time: 9:00 a.m.  
Judge: Hon. John A. Houston  
Crtrm: 13B

Complaint Filed: September 4, 2015

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10 TO THE HONORABLE COURT AND ALL PARTIES AND THEIR  
11 ATTORNEYS OF RECORD:

12 By and through his counsel of record in this action, Plaintiff MICKAIL  
13 MYLES hereby submits the following Proposed Preliminary Separate Statement  
14 to be provided to the jury panel at the time of trial, pursuant to Federal Rules of  
15 Civil Procedure 16 and 51; United States District Court, southern District of  
16 California local Rules 16-1; and the Orders of the Court (as applicable).

17 The signatory party reserves the right to amend this Preliminary Separate  
18 Statement, subject to any objections, motions *in limine*, and pertinent Orders of  
19 the Court.

20 Dated: July 19, 2022

DICKS & WORKMAN  
ATTORNEYS AT LAW, APC

21  
22 By: /s/ Joseph G. Dicks  
23 Joseph G. Dicks  
24 Attorneys for Mickail Myles, Plaintiff  
25 Email: [jdicks@dicks-workmanlaw.com](mailto:jdicks@dicks-workmanlaw.com)  
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**PROPOSED PRELIMINARY SEPARATE STATEMENT**

This is a Civil Rights case. Plaintiff Mr. Myles contends that his civil rights were violated due to the County of San Diego Sheriff's use of excessive force against him. Mr. Myles also contends that the County had a policy not to investigate excessive force incidents which was also a cause of his injuries. Mr. Myles contends that he suffered PTSD, emotional distress and brain damage as a result of excessive force and the County's policy. The County denies it used excessive force or had a policy that led to Mr. Myles injuries. The County also disputes the nature and extent of Mr. Myles' injuries.

Dated: July 19, 2022

DICKS & WORKMAN  
ATTORNEYS AT LAW, APC

By: /s/ Joseph G. Dicks  
Joseph G. Dicks  
Attorneys for Mickail Myles, Plaintiff  
Email: [jdicks@dicks-workmanlaw.com](mailto:jdicks@dicks-workmanlaw.com)